

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	S.D.N.Y. Bankr.
Debtors.	Chapter 11
	Case No. 08-13555 (JMP)

**DECLARATION OF ANDREW K. GLENN**

ANDREW K. GLENN, hereby declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of his knowledge, information, and belief:

1. I am a partner in the law firm of Kasowitz, Benson, Torres & Friedman LLP, counsel for the Dante Noteholders in the above-referenced adversary proceeding. I make this declaration to present the Court with the attached documents in connection with the *Objection of the Dante Noteholders to the Debtors' Assumption of Certain Derivative Contracts*.
2. Attached hereto as **Exhibit A** is a copy of the Base Prospectus for the Multi Issuer Secured Obligation Programme, dated July 20, 2007.
3. Attached hereto as **Exhibit B** is a copy of the Principal Trust Deed relating to the Multi Issuer Secured Obligation Programme, dated October 10, 2002, as amended and restated on July 18, 2008.
4. Attached hereto as **Exhibit C** is a copy of the Supplemental Trust Deed and Drawdown Agreement with respect to Zircon Finance Limited Series 2007-9, Tranche A Notes, issued pursuant to the Multi Issuer Secured Obligation Programme, dated June 6, 2007.
5. Attached hereto as **Exhibit D** is a copy of the ISDA Master Agreement between Dante Finance Public Limited Company and Lehman Brothers Special Financing, Inc., dated October 10, 2002, as amended and restated on July 20, 2007.

6. Attached hereto as **Exhibit E** is a copy of the Swap Confirmation, with respect to Zircon Finance Limited Series 2007-9, Tranche A Notes, issued pursuant to the Multi Issuer Secured Obligation Programme, dated June 6, 2007.

7. Attached hereto as **Exhibit F** is a copy of the Schedule to the Master Agreement between Dante Finance Public Limited Company and Lehman Brothers Special Financing, Inc., dated October 10, 2002, as amended and restated on July 18, 2008.

8. Attached hereto as **Exhibit G** is a copy of the Series Prospectus for the Zircon Finance Limited Series No. 2007-9, Tranche A Notes, issued pursuant to the Multi Issuer Secured Obligation Programme, dated June 6, 2007.

9. Attached hereto as **Exhibit H** is a copy of letters, dated between November 28 and December 2, 2008, from certain noteholders to BNY Corporate Trustee Services Limited with respect to the Zircon Finance Limited Series No. 2007-9, Tranche A Notes, issued pursuant to the Multi Issuer Secured Obligation Programme.

10. Attached hereto as **Exhibit I** is a copy of a letter, dated December 22, 2008, from Zircon Finance Limited to Lehman Brothers Special Financing, Inc., with respect to the Zircon Finance Limited Series No. 2007-9, Tranche B Notes, issued pursuant to the Multi Issuer Secured Obligation Programme.

11. Attached hereto as **Exhibit J** is a copy of a Notice of Outcome of Meeting, dated March 30, 2009, from BNY Corporate Trustee Services Limited with respect to the Zircon Finance Limited Series No. 2007-9, Tranche A Notes, issued pursuant to the Multi Issuer Secured Obligation Programme.

12. Attached hereto as **Exhibit K** is a copy of Notices to Terminate Swap Transactions, from Zircon Finance Limited, Saphir Finance Public Limited Company and Beryl

Finance Limited to Lehman Brothers Special Financing, Inc., with respect to certain notes issued pursuant to the Multi Issuer Secured Obligation Programme.

13. Attached hereto as **Exhibit L** is a copy of Notices to Holders, dated May 29, 2009 from BNY Corporate Trustee Services Limited, with respect to certain notes issued pursuant to the Multi Issuer Secured Obligation Programme.

14. Attached hereto as **Exhibit M** is a copy of a Early Redemption of Notes notice, dated September 27, 2010, from Beryl Finance Limited with respect to the Beryl Finance Limited Series No. 2008-14 Notes, issued pursuant to the Multi Issuer Secured Obligation Programme.

15. Attached hereto as **Exhibit N** is a copy of the Approved Judgment, *Perpetual Tr. Co. Ltd. v. BNY Corporate Tr. Servs. Ltd.*, [2009] EWHC 1912, dated July 28, 2009.

16. Attached hereto as **Exhibit O** is a copy of the Claim Form, dated June 9, 2009, *Belmont Park Investments Pty Ltd & Others v. BNY Corporate Trustee Services Limited* (Claim No. HC09C01931).

17. Attached hereto as **Exhibit P** is a copy of the Order, dated June 19, 2009, *Belmont Park Investments Pty Ltd & Others v. BNY Corporate Trustee Services Limited* (Claim No. HC09C01931).

18. Attached hereto as **Exhibit Q** is a copy of the Order, dated July 28, 2009, *Belmont Park Investments Pty Ltd & Others v. BNY Corporate Trustee Services Limited* (Claim No. HC09C01931).

19. Attached hereto as **Exhibit R** is a copy of the Approved Judgment, *Perpetual Tr. Co. Ltd. v. BNY Corporate Tr. Servs. Ltd.*, [2009] EWCA Civ. 1160, dated November 6, 2009.

20. Attached hereto as **Exhibit S** is a copy of the Judgment, *Belmont Park Investments PTY Limited (Respondent) v. BNY Corporate Trustee Services Limited and Lehman Brothers Special Financing Inc. (Appellant)*, [2011] UKSC 38, dated July 27, 2011.

I declare that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: New York, New York  
November 4, 2011

/s/ Andrew K. Glenn  
ANDREW K. GLENN